

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)  
josefansorge@quinnemanuel.com  
1300 I. Street, N.W., Suite 900  
Washington, D.C. 20005  
Telephone: 202-538-8000  
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)  
jonathantse@quinnemanuel.com  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)  
jomairecrawford@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ANDREW  
SCHAPIRO IN SUPPORT OF GOOGLE  
LLC'S RESPONSE TO PLAINTIFFS'  
RENEWED REQUEST TO DEPOSE  
GOOGLE CEO SUNDAR PICHAI (DKT.  
635)**

Referral: Hon. Susan van Keulen, USMJ

**DECLARATION OF ANDREW H. SCHAPIRO**

I, Andrew H. Schapiro, declare as follows:

1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google LLC (“Google”) in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Illinois and admitted to practice *pro hac vice* in the Northern District of California by this Court. Dkt. 37. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the June 30, 2022 deposition of Sabine Borsay.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the May 6, 2022 deposition of Lorraine Twohill.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the February 18, 2022 deposition of Rory McClelland.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the January 18, 2022 deposition of Ramin Halavati.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the November 19, 2021 deposition of Sammit Adhya.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the November 24, 2021 deposition of Abdelkarim Mardini.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the August 19, 2021 deposition of Brian Rakowski.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 4th day of August, 2022, at Chicago, Illinois.

By /s/ Andrew H. Schapiro  
Andrew H. Schapiro